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8 Attorneys for Defendant ZOGSPORTS HOLDINGS LLC,
erroneously sued as ZOGSPORTS
9

10 UNITED STATES DISTRICT COURT

11 CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

12 KEITH ERNST, ARTHUR
OGANESYAN, and ALAN NAH,
13 individually and on behalf of all others
similarly situated,
14

15 Plaintiffs,

16 v.

17 ZOGSPORTS, an unknown business
entity; and DOES 1-50, inclusive,
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19 Defendants.
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Case No. 2:18-cv-09043-RGK (MRWx)

**DEFENDANT'S OBJECTIONS TO
EVIDENCE FILED IN SUPPORT
OF PLAINTIFFS' MOTION FOR
CONDITIONAL COLLECTIVE
ACTION CERTIFICATION
PURSUANT TO FLSA SECTION
216(B) AND MOTION FOR CLASS
CERTIFICATION PURSUANT TO
FRCP RULE 23**

Judge: Hon. R. Gary Klausner
Date: February 11, 2019
Time: 9:00 a.m.
Dept.: 850

Complaint Filed: October 22, 2018
Trial Date: September 20, 2018

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1 Defendant ZOGSPORTS HOLDINGS LLC (“ZOGSPORTS”) respectfully
2 objects to the following purported evidence submitted by Plaintiffs KEITH ERNST,
3 ARTHUR OGANESYAN, and ALAN NAH in support of their Motion for
4 Conditional Collective Action Certification Pursuant to FLSA Section 216(B) and
5 Motion for Class Certification Pursuant to FRCP 23 in the above-entitled action:

6 **OBJECTIONS TO DECLARATION OF WILLIAM W. ROBERTS, PH.D.**

7 1. **Objectionable Material:** “I have consulted with Plaintiffs’ counsel and
8 have reviewed documents related to this matter, a list of which is attached as Exhibit
9 B.” Roberts Decl. ¶ 6 & Ex. B, Docket Entry 27-2. The statement and Exhibit B to
10 Mr. Roberts’ declaration lack foundation (FRE 602) and authentication (FRE 901).

11 More specifically, the documents in Exhibit B have not been authenticated by
12 any individual with personal knowledge as to who wrote, generated, signed, or used
13 the documents, or saw others do so; instead, it is merely attached to Mr. Roberts’
14 declaration and relied upon for the conclusions stated therein. *Las Vegas Sands,*
15 *LLC v. Nehme*, 632 F.3d 526, 533 (9th Cir. 2011) (“A document authenticated
16 through personal knowledge must be attached to an affidavit, and the affiant must be
17 a competent witness who wrote, signed it, used it, or saw others do so.”)

18 2. **Objectionable Material:** “Based upon the records and documents I
19 have reviewed, I believe liability for the claims in this case can be determined from
20 Defendant’s Policies and testimony of the 30(b)(6) witness.” Roberts Decl. ¶ 9,
21 Docket Entry 27-2. Mr. Roberts’ conclusions lack foundation (FRE 602), and are
22 speculative and unreliable (FRE 702).

23 Mr. Roberts’ opinions are inadmissible because they are based on documents
24 that have not been authenticated, for which no foundation has been laid, and that
25 have not been produced in support of the stated opinions. *See* Objection No. 1,
26 *supra*; *Samuels v. Holland American Line-USA Inc.*, 656 F3d 948, 952-953 (9th Cir.
27 2011) (opinion excluded where plaintiff's expert did not produce any materials from
28 cruise-line industry to support statement that it is common knowledge waters were

1 extremely dangerous for swimming); *ZF Meritor, LLC v. Eaton Corp.*, 696 F.3d
2 254, 291-293 (3rd Cir. 2012) (experts may not testify based on data prepared by
3 persons unknown to the expert, who lacks knowledge of the methodology used to
4 prepare the data).

5 Further, Mr. Roberts' opinion that liability can be determined from the
6 specified records is speculative and unreliable. The declarant concedes at multiple
7 points in Paragraph 10 of his declaration that he is relying on assumptions and
8 conjecture as to the meaning of the data set forth in the documents identified in
9 Exhibit B to his declaration. Specifically, he testifies: "ZOG000002.xlsx *appears to*
10 contain a location of games and days of the week for those games..."; the same file
11 "includes a number for 'volunteerteamcount,' which *I assume* is the number of
12 volunteer referees..."; "The files ZOG000003.xlsx to ZOG000011.xlsx appear to
13 contain a list of games" Experts may not testify based on data prepared by
14 persons unknown to the expert, who lacks knowledge of the methodology used to
15 prepare the data. Such testimony does not meet the reliability requirements of
16 Federal Rule of Evidence 702. *ZF Meritor, LLC*, 696 F.3d at 291-293; *Nelson v.*
17 *Tennessee Gas Pipeline Co.*, 243 F.3d 441, 444 (6th Cir. 2001) (courts may exclude
18 expert testimony that is purely speculative; "knowledge connotes more than
19 subjective belief or unsupported speculation").

20 3. **Objectionable Material:** "I have been provided with a set of eleven
21 Excel files containing data related to ZogSports. These files are labelled
22 ZOG000002.xlsx through ZOG000012.xlsx. The file ZOG000002.xlsx appears to
23 contain a location of games and days of the week for those games from Spring 2014
24 through Fall 2018. It also includes a number for 'volunteerteamcount' which I
25 assume is the number of volunteer referees for that location and the number is
26 consistent with 30(b)(6) testimony. The number is either a 1 or 2, depending upon
27 the location. The files ZOG000003.xlsx to ZOG000011.xlsx appear to contain a list
28 of games, by dates along with the teams scheduled to play. The file also contains a

1 column labeled ‘Volunteer Ref(s)’ which, based upon 30(b)(6) testimony, indicates
2 the team scheduled to supply a volunteer referee for that game. The
3 ZOG000012.xlsx file appears to contain a list of websites for game rules.” Roberts
4 Decl. ¶ 10, Docket Entry 27-2. The statement and referenced documents lack
5 foundation (FRE 602) and authentication (FRE 901).

6 More specifically, the documents referenced by Mr. Roberts have not been
7 authenticated by any individual with personal knowledge as to who wrote,
8 generated, signed, or used the documents, or saw others do so; instead, they are
9 merely referenced in Mr. Roberts’ declaration and relied upon for the conclusions
10 stated therein. *Las Vegas Sands*, 632 F.3d at 533.

11 4. **Objectionable Material:** “From the ZOG00003 to ZOG000011 files
12 we have a count of 12,392 games scheduled. These games all appear to be football
13 games. The average number of volunteer referees requested per game, estimated
14 from the data, is 1.5543. This amounts to 19,257 requested volunteer referees.
15 Having the dates and locations for these scheduled games, along with the list of
16 teams scheduled to supply the volunteers, we have calculated the number of referees
17 requested. Assuming that liability has been found, the potential damages can be
18 calculated from the date, location of the potential violation and the prevailing
19 minimum wage. Since we have the dates, interest can also be calculated.” Roberts
20 Decl. ¶ 12, Docket Entry 27-2. Mr. Roberts’ conclusions lack foundation (FRE
21 602), irrelevant (FRE 402), and are speculative and unreliable (FRE 702).

22 Mr. Roberts’ opinions are inadmissible because they are based on documents
23 that have not been authenticated, for which no foundation has been laid, and that
24 have not been produced in support of the stated opinions. *See* Objection No. 1,
25 *supra*; *Samuels*, 656 F3d at 952-953; *ZF Meritor*, 696 F.3d at 291-293. Mr.
26 Roberts’ conclusions are also speculative and unreliable for the reasons specified in
27 Objection No. 2. Finally, Mr. Roberts’ testimony refers specifically to *scheduled*
28 games, and not to games that actually took place and for which a volunteer referee

1 was actually present. In the absence of some evidence establishing a connection
2 between scheduled games and games that actually utilized a volunteer referee, Mr.
3 Roberts' opinions regarding the ascertainment of damages based on the frequency
4 and number of scheduled games is speculative, conclusory, and self-serving, and has
5 no relevance to liability or damages in this case. FRE 402, 702; *Federal Trade*
6 *Comm'n v. Publishing Clearing House, Inc.*, 104 F.3d 1168, 1171 (9th Cir. 1997).

7 **5. Objectionable Material:** "As to Plaintiff's independent and derivative
8 wage statement class, based upon the damages calculated above as possibly
9 augmented by information gathered from our questionnaire process, I could estimate
10 the total number of wage statements that should have been issued to each class
11 member and the corresponding statutory penalties for each potential class
12 employee." Roberts Decl. ¶ 14, Docket Entry 27-2. Mr. Roberts' testimony
13 contains legal conclusions that he is not qualified to offer as an statistician and
14 economist (FRE 702). His testimony also lacks foundation (FRE 602), is irrelevant
15 (FRE 402), and is speculative and unreliable (FRE 702).

16 Paragraph 2 of Mr. Roberts' declaration shows that his area of purported
17 expertise is "primarily in the areas of statistics, economics, finance, and survey-
18 related research." Nothing in his declaration establishes that he is qualified to
19 opinion on legal questions such as "the total number of wage statements that should
20 have been issued" or "the corresponding statutory penalties." Because these legal
21 conclusions are outside his purported area of expertise, Mr. Roberts is not qualified
22 to provide expert testimony on those subjects. FRE 702; *Khoury v. Philips Med.*
23 *Systems*, 614 F.3d 888, 893 (8th Cir. 2010) (district court properly precluded expert
24 from testifying to matters outside his area of expertise).

25 Further, Mr. Roberts' opinions are inadmissible because they are based on
26 documents that have not been authenticated, for which no foundation has been laid,
27 and that have not been produced in support of the stated opinions. *See* Objection
28 No. 1, *supra*; *Samuels*, 656 F3d at 952-953; *ZF Meritor*, 696 F.3d at 291-293. Mr.

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1 Roberts' conclusions are also irrelevant, speculative, and unreliable for the reasons
2 specified in Objection No. 4.

3 6. **Objectionable Material:** "Analysis of Defendant provided records
4 along with any additional information gathered could then be used to calculate 203
5 penalties." Roberts Decl. ¶ 15, Docket Entry 27-2. Mr. Roberts' testimony contains
6 legal conclusions that he is not qualified to offer as an statistician and economist
7 (FRE 702). His testimony also lacks foundation (FRE 602), is irrelevant (FRE 402),
8 and is speculative and unreliable (FRE 702). *See* discussion and authorities cited in
9 Objection Nos. 4-5.

10 7. **Objectionable Material:** "The claim for 226.8 is derivative and can be
11 calculated from the information used in calculating the claims above." Roberts
12 Decl., ¶ 16, Docket Entry 27-2. Mr. Roberts' testimony contains legal conclusions
13 that he is not qualified to offer as an statistician and economist (FRE 702). His
14 testimony also lacks foundation (FRE 602), is irrelevant (FRE 402), and is
15 speculative and unreliable (FRE 702). *See* discussion and authorities cited in
16 Objection Nos. 4-5.

17 8. **Objectionable Material:** Roberts Decl. ¶¶ 23-27, in their entirety
18 (Docket Entry 27-2). Mr. Roberts' testimony in these paragraphs describes a data
19 analysis process that is irrelevant and unreliable in this context, and is therefore
20 inadmissible (FRE 402, 702-703).

21 In Paragraphs 20 and 23 of his declaration, Mr. Roberts testifies that the class
22 questionnaires he proposes are not "surveys," but proceeds to describe an approach
23 to questionnaire design and implementation that he describes in Paragraph 23 as
24 "among the best *survey* research practices." Mr. Roberts offers no testimony
25 establishing that his "Total Survey Error" approach is reasonably relied upon by
26 experts in his field when forming opinions or inferences based on class
27 questionnaires, as opposed to "surveys." FRE 703; *Carson Harbor Village, Ltd. v.*
28 *Unocal Corp.*, 270 F.3d 863, 873 (9th Cir. 2001). The excerpts from the Reference

1 Manual on Scientific Evidence, Third Edition, cited by Mr. Roberts in support of his
2 proposed methodology refer specifically to “survey” activities, which Mr. Roberts
3 has testified does not include class questionnaires. Therefore, absent some evidence
4 establishing that the same methodology is equally applicable to class questionnaires
5 and is relied upon by experts in his field for that purpose, Mr. Roberts’ testimony in
6 Paragraphs 23 through 27 of his declaration is irrelevant, speculative, and unreliable.

7 **OBJECTIONS TO DECLARATION OF KEITH ERNST**

8 9. **Objectionable Material:** “I understand that ZogSports required
9 participants to volunteer as referees for other participants’ games, and that my team
10 would be penalized if we did not provide a volunteer referee.” Ernst Decl. ¶ 2,
11 Docket Entry 27-4. Mr. Ernst’s testimony lacks foundation, in that Mr. Ernst
12 provides no information indicating that the “understanding” to which he testifies is
13 based upon his personal knowledge as opposed to information learned from another
14 person. FRE 602; *Kaczmarek v. Allied Chemical Corp.*, 836 F.2d 1055, 1060-61
15 (7th Cir. 1987). Because it appears to be based on information learned from another
16 person, Mr. Ernst’s testimony also incorporates inadmissible hearsay. FRE 802.

17 10. **Objectionable Material:** “To my knowledge, there are no conflicts
18 which exist between my interest in this action and the interest of the class members
19 that would impair my ability to serve as a representative.” Ernst Decl. ¶ 4, Docket
20 Entry 27-4. Mr. Ernst’s testimony constitutes an improper legal conclusion by a lay
21 witness, and is conclusory and self-serving. FRE 701; *Nationwide Transport*
22 *Finance v. Cass Information Systems, Inc.*, 523 F.3d 1051, 1059-1060 (9th Cir.
23 2008) (legal conclusions properly excluded regardless of whether testimony
24 constituted lay or expert opinion); *Federal Trade Comm’n*, 104 F.3d at 1171 (“A
25 conclusory, self-serving affidavit, lacking detailed facts and any supporting
26 evidence, is insufficient to create a genuine issue of material fact”).

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OBJECTIONS TO DECLARATION OF ALAN NAH

11. **Objectionable Material:** “I understand that ZogSports required participants to volunteer as referees for other participants’ games, and that my team would be penalized if we did not provide a volunteer referee.” Nah Decl. ¶ 2, Docket Entry 27-5. Mr. Nah’s testimony lacks foundation, in that Mr. Nah provides no information indicating that the “understanding” to which he testifies is based upon his personal knowledge as opposed to information learned from another person. FRE 602; *Kaczmarek*, 836 F.2d at 1060-61. Because it appears to be based on information learned from another person, Mr. Nah’s testimony also incorporates inadmissible hearsay. FRE 802.

12. **Objectionable Material:** “To my knowledge, there are no conflicts which exist between my interest in this action and the interest of the class members that would impair my ability to serve as a representative.” Nah Decl. ¶ 4, Docket Entry 27-5. Mr. Nah’s testimony constitutes an improper legal conclusion by a lay witness, and is conclusory and self-serving. FRE 701; *Nationwide Transport Finance*, 523 F.3d at 1059-1060; *Federal Trade Comm’n*, 104 F.3d at 1171.

OBJECTIONS TO DECLARATION OF ARTHUR OGANESYAN

13. **Objectionable Material:** “I understand that ZogSports required participants to volunteer as referees for other participants’ games, and that my team would be penalized if we did not provide a volunteer referee.” Oganessian Decl. ¶ 2, Docket Entry 27-6. Mr. Oganessian’s testimony lacks foundation, in that Mr. Oganessian provides no information indicating that the “understanding” to which he testifies is based upon his personal knowledge as opposed to information learned from another person. FRE 602; *Kaczmarek*, 836 F.2d at 1060-61. Because it appears to be based on information learned from another person, Mr. Oganessian’s testimony also incorporates inadmissible hearsay. FRE 802.

14. **Objectionable Material:** “To my knowledge, there are no conflicts which exist between my interest in this action and the interest of the class members

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1 that would impair my ability to serve as a representative.” Oganessian Decl. ¶ 4,
2 Docket Entry 27-6. Mr. Oganessian’s testimony constitutes an improper legal
3 conclusion by a lay witness, and is conclusory and self-serving. FRE 701;
4 *Nationwide Transport Finance*, 523 F.3d at 1059-1060; *Federal Trade Comm’n*,
5 104 F.3d at 1171.

6 **OBJECTIONS TO DECLARATION OF DANNY YADIDSION, ESQ.**

7 15. **Objectionable Material:** “Prior to becoming a partner of Labor Law
8 PC, I exclusively practiced employment law for over nine years at defense firms.
9 From approximately December 2011 to September 2018, I exclusively practiced
10 employment law and defended numerous class actions at Jackson Lewis PC in Los
11 Angeles. From June 2009 to December 2011, I exclusively practiced employment
12 law and defended numerous class actions at Lewis Brisbois Bisgaard & Smith LLP
13 in Los Angeles.” Yadidsion Decl. ¶ 6, Docket Entry 27-7. Mr. Yadidsion’s
14 testimony regarding his work as defense counsel is irrelevant to his qualifications
15 and competency to serve as class counsel. Class counsel must show that he or she is
16 able “to fairly and adequately represent the interests of the class.” FRCP
17 23(g)(1)(B); *Radcliffe v. Hernandez*, 818 F.3d 537, 548 (9th Cir. 2016). Mr.
18 Yadidsion’s experience representing class action *defendants* has only a tangential
19 relation to his qualifications to protect the interests of a putative class, and should be
20 disregarded for the purpose of assessing his qualifications and competency to serve
21 as class counsel.

22 16. **Objectionable Material:** “By way of example, shortly prior to leaving
23 Jackson Lewis PC, I successfully prevailed on a motion for class certification on
24 behalf of my clients in a case heavily litigated for over 7.5 years and successfully
25 moved to dismiss a complaint in federal court based on the federal enclave
26 doctrine.” Yadidsion Decl. ¶ 6, Docket Entry 27-7. Mr. Yadidsion’s testimony
27 regarding his work as defense counsel is irrelevant to his qualifications and
28 competency to serve as class counsel. Class counsel must show that he or she is

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1 able “to fairly and adequately represent the interests of the class.” FRCP
2 23(g)(1)(B); *Radcliffe*, 818 F.3d at 548. Mr. Yadidsion’s success in *defeating* a
3 motion for class certification for a class action defendant and securing the dismissal
4 of a federal court action for another defendant have little, if any, bearing on his
5 ability to protect the interests of a putative plaintiff class. These matters should be
6 disregarded for the purpose of assessing Mr. Yadidsion’s qualifications and
7 competency to serve as class counsel.

8 17. **Objectionable Material:** Yadidsion Decl., Ex. B (Docket Entry 27-8),
9 at 13:3-14:4 (according to PACER pagination). The question put to the deponent is
10 beyond the scope of the Rule 30(b)(6) deposition. *See* Healy Decl. I.S.O. Objection
11 No. 17, ¶ 2 & Ex. 1.

12 18. **Objectionable Material:** Yadidsion Decl., Ex. B (Docket Entry 27-8),
13 at 51:8-15 (according to PACER pagination). Counsel’s question lacks foundation
14 and assumes facts.

15 19. **Objectionable Material:** Yadidsion Decl., Ex. B (Docket Entry 27-8),
16 at 56:11-20 (according to PACER pagination). Counsel’s question is compound and
17 an incomplete hypothetical.

18 20. **Objectionable Material:** Yadidsion Decl., Ex. B (Docket Entry 27-8),
19 at 75:21-76:1 (according to PACER pagination). Counsel’s question is vague and
20 compound.

21 21. **Objectionable Material:** Yadidsion Decl., Ex. B (Docket Entry 27-8),
22 at 77-85 (according to PACER pagination). There is no foundation for this
23 document and no testimony has been offered to authenticate it based upon personal
24 knowledge. FRE 602, 901; *Las Vegas Sands, LLC*, 632 F.3d at 533 (“A document
25 authenticated through personal knowledge must be attached to an affidavit, and the
26 affiant must be a competent witness who wrote, signed it, used it, or saw others do
27 so”).
28

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22. **Objectionable Material:** Yadidsion Decl., Ex. B (Docket Entry 27-8), at 86-92 (according to PACER pagination). There is no foundation for this document and no testimony has been offered to authenticate it based upon personal knowledge. FRE 602, 901; *Las Vegas Sands, LLC*, 632 F.3d at 533.

23. **Objectionable Material:** Yadidsion Decl., Ex. B (Docket Entry 27-8), at 95 (according to PACER pagination). There is no foundation for this document and no testimony has been offered to authenticate it based upon personal knowledge. FRE 602, 901; *Las Vegas Sands, LLC*, 632 F.3d at 533. The deponent did not authenticate the document, and instead testified that he did not recognize it. *See* Yadidsion Decl., Ex. B (Docket Entry 27-8), at 67:2-9 (according to PACER pagination).

Defendant respectfully requests that the Court sustain the above objections and strike the evidence referred to above in ruling on Plaintiffs' Motion.

Dated: January 18, 2019

ATKINSON, ANDELSON, LOYA, RUUD & ROMO

By: /s/ Amber S. Healy
Amber S. Healy
Attorneys for Defendant ZOGSPORTS
HOLDINGS LLC, erroneously sued as
ZOGSPORTS

DECLARATION OF AMBER HEALY, ESQ.
IN SUPPORT OF OBJECTION NO. 17

I, Amber Healy, declare:

1. I am a partner with the law offices of Atkinson Andelson Loya Ruud & Romo, counsel of record in the above entitled action to Defendant ZOGSPORTS HOLDINGS LLC. I make this Declaration in support of Defendant's Objection No. 17, above. The following facts are based on my personal knowledge, and I could and would testify competently to each of them if called upon to do so.

2. On December 11, 2018, Plaintiffs KEITH ERNST, ARTHUR OGANESYAN, and ALAN NAH took the deposition of Michael Mortellaro as Defendant's Rule 30(b)(6) representative on specified topics, which were set forth in Plaintiffs' Amended Notice of Deposition for Mr. Mortellaro. I defended the deposition on behalf of Defendant and am familiar with the testimony given and the documents attached as exhibits to the deposition. Attached as Exhibit 1 to this Declaration is Plaintiffs' aforesaid Amended Notice of Deposition, which was also attached as an exhibit to Mr. Mortellaro's deposition transcript.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Dated January 18, 2019 at Cerritos, California.

/s/ Amber Healy
AMBER HEALY

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